To: Members of the House Committee on Great Lakes and Environment
From: Melissa J. Slotnick, PhD, MPH, MESc
Ann Arbor, MI
Re: Statement in Support of the Safe Children's Products Act, HB 4763-69
Date: April 22, 2009

As a parent you do everything in your power to keep your children safe. You put your baby on their back to sleep to prevent SIDS, you install safety latches on the cabinet doors to prevent accidental poisonings, you make them wear a helmet while riding their bike, and you always scan a room for potential choking hazards before letting that crawling baby explore. As a parent you also do your best to provide your child with products that are developmentally stimulating.

I believe that until recently most parents, myself included, assumed these toys and other products to be relatively safe for their child. There may be the potential choking hazard (labeled as such on products not intended for children under three), but these hazards are often quite visible and easily assessed by the parent. For example, my son, who is now three years old, loves to play with his foam bath letters and numbers in the tub. He has loved playing with these letters since he was a little baby, and also loved to chew on them. I always supervise him carefully in the tub, and I figured he was not likely to choke on this product (which is labeled appropriate for children age 3 and up). You can imagine my disbelief to find that, according to the HealthyToys.org project, these seemingly harmless foam pieces had mercury concentrations ranging from 373 to 463 ppm (or micrograms/gram). To put that in perspective, my son, who weighs roughly 33 pounds (14.85 Kg), would only have to ingest 1.485 micrograms of mercury to reach the EPA's Reference Dose of 0.1 microgram mercury per kilogram body weight per day for mercury exposure from fish. This concentration would have been even smaller when he was an infant. It is unbelievable to me that mercury, a known developmental neurotoxin, is present at all in a child's toy, particularly in the amounts reported.

In addition to being a parent of two young children, I am a scientist. My training is in Environmental Health Sciences; and, in particular, I am trained in exposure assessment. Given the scenario above there is potential for a child's exposure to mercury via ingestion, and possibly via other exposure routes. There are numerous factors in this situation that affect the amount of the contaminant entering the bloodstream, many of them still unknown. There are also numerous factors affecting to what degree the contaminant may produce an adverse biological response, including the form of mercury present in the product. Each exposure situation is unique and it is impossible to give a prediction with 100% accuracy. However, it is known that children's developing bodies and activity patterns make them particularly vulnerable to many environmental toxicants. In addition, a child may be exposed to toxicants through many different exposure pathways. For example, children are at risk for mercury exposure through consumption of contaminated fish, particularly in the Great Lakes region. Independently each exposure route may contribute only trace amounts to total daily exposure, but together they may result in exposures which exceed levels determined to be safe.

What is most concerning to me is that the situation described above is preventable. It's preventable in the fact that had I known that the product contained high mercury concentrations I would have never allowed my son to put it in his mouth. Additionally, it is probable that it is not necessary for this product to contain mercury to be an effective toy. I think that we as parents and consumers have a right to know what we are putting in the hands of our children. I think that we as scientists and policy makers have an obligation to ask ourselves how we can do more to understand the hazards and effectively convey that information. By making information regarding levels of potentially hazardous chemicals in children's products known, the parent is empowered to protect their child. For these reasons I urge you to support the Safe Children's Product Act. Thank you for listening to my concerns.

Sincerely,

Melissa J. Slotnick, PhD, MPH, MESc